

CHARLES L.A. TERRENI ATTORNEY AT LAW 1508 Lady Street

COLUMBIA, SOUTH CAROLINA 29201

TELEPHONE (803) 771-7228

EMAIL CHARLES.TERRENI@TERRENILAW.COM

WWW.TERRENILAW.COM

November 29, 2018

The Honorable Jocelyn G. Boyd Chief Clerk and Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: DOCKET NO. 2018-355-T-Jason Kupiec, Complainant/Petitioner v. JMS Worldwide, LLC, Defendant/Respondent

Dear Ms. Boyd:

Today, I received a prefiled testimony letter in the above referenced docket. On November 27, 2018, Respondent, JMS Worldwide, LLC filed a Motion to Dismiss and Motion to Stay based on lack of subject matter jurisdiction. If granted, either motion would obviate the need for prefiled testimony according to the schedule set out in the letter. I am therefore respectfully requesting the Commission consider the Respondent's motions at its earliest convenience.

With best wishes, I am,

Sincerely yours,

s/ Charles L.A. Terreni

Charles L.A. Terreni

c: Becky Dover, Esq.
Carry Lybarker, Esq.
Jenny R. Pittman, Esq.
F. Miles Adler, Esq.
Mr. Richard Johnson
Ms. Mary Johnson

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2018-355-T

CERTIFICATE OF SERVICE

I, CARL E. BELL, hereby certify that I have, on this 29th day of November 2018, served the LETTER upon the parties listed below by email and US MAIL to the following person(s) and addresses:

Jenny R. Pittman, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 jpittman@regstaff.sc.gov

Mary Johnson Johnson's Moving & Storage, LLC 2818 Industrial Avenue, Suite A Charleston, SC 29405 molly@johnsonsmoving.net

Becky Dover, Esquire S.C. Department of Consumer Affairs 221 Devine Street, Suite 200 Columbia, SC 29205 bdover@scconsumer.gov F. Miles Adler, Counsel Adler Law Firm, LLC Post Office Box 4743 Pawleys Island, SC 29585 miles@adlerlaw.partners

Richard Johnson JMS Worldwide, LLC 2818 A Industrial Avenue N. Charleston, SC 29045 richard@johnsonsmoving.net

Carolyn Lybarker, Esquire S.C. Dept of Consumer Affairs P.O. Box 5757 Columbia, SC 2950 clybarker@scconsumer.gov

Carl E. Bell, Paralega Terreni Law Firm, LLC

1508 Lady Street

Columbia, South Carolina 29201

Telephone (803) 771-7228

Fax (803) 771-8778 carlbell@terrenilaw.com

Columbia, South Carolina November 29, 2018